

REDISTRICTING PANEL

Sachs Plaintiffs' Congressional and Legislative Plans

Afternoon Presentation

Oral Argument - January 4, 2022

CONGRESSIONAL PLAN

PLANS MUST EMBRACE ALL OF THE REDISTRICTING PRINCIPLES

The Panel listed its principles “in no particular order.”

- No principle is elevated over the others.
- No principle may be ignored.
- No principle may be displaced by a party’s own priorities.

Must exercise judgment to balance all of the principles.

“LEAST CHANGE”

- Principle was not adopted by this Panel.
- Elevates convenience for election administration over fairness.
- May balance population, but ignores demographic trends and evolving communities of interest.

THINGS HAVE CHANGED

District		2020 Population	2011 Population	% Increase
1	-22,586 persons	690,726	662,991	4.02%
2	+18,646 persons	731,958	662,991	9.42%
3	+24,586 persons	737,898	662,990	10.15%
4	+13,164 persons	726,476	662,990	8.74%
5	+22,724 persons	736,036	662,991	9.92%
6	+20,645 persons	733,957	662,990	9.67%
7	-37,798 persons	673,514	662,991	1.56%
8	-37,383 persons	675,929	662,991	1.91%

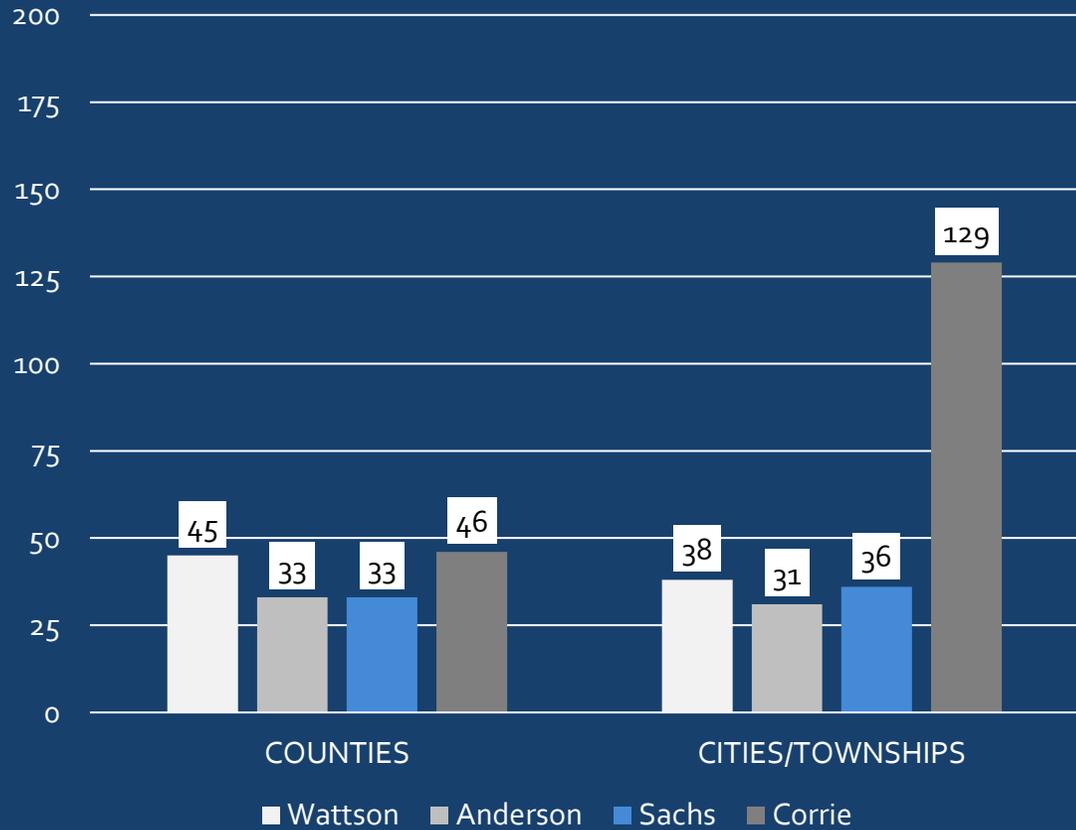
PARTISANSHIP

The Sachs Plaintiffs do not endorse the validity of the Wattson analysis of partisanship and are mindful that the Court rejected the Wattson Plaintiffs' proposed "partisanship" principle. Nonetheless, the Wattson analysis shows that the Sachs Congressional Plan is **closest to the "ideal"** under the proposed partisanship measures.

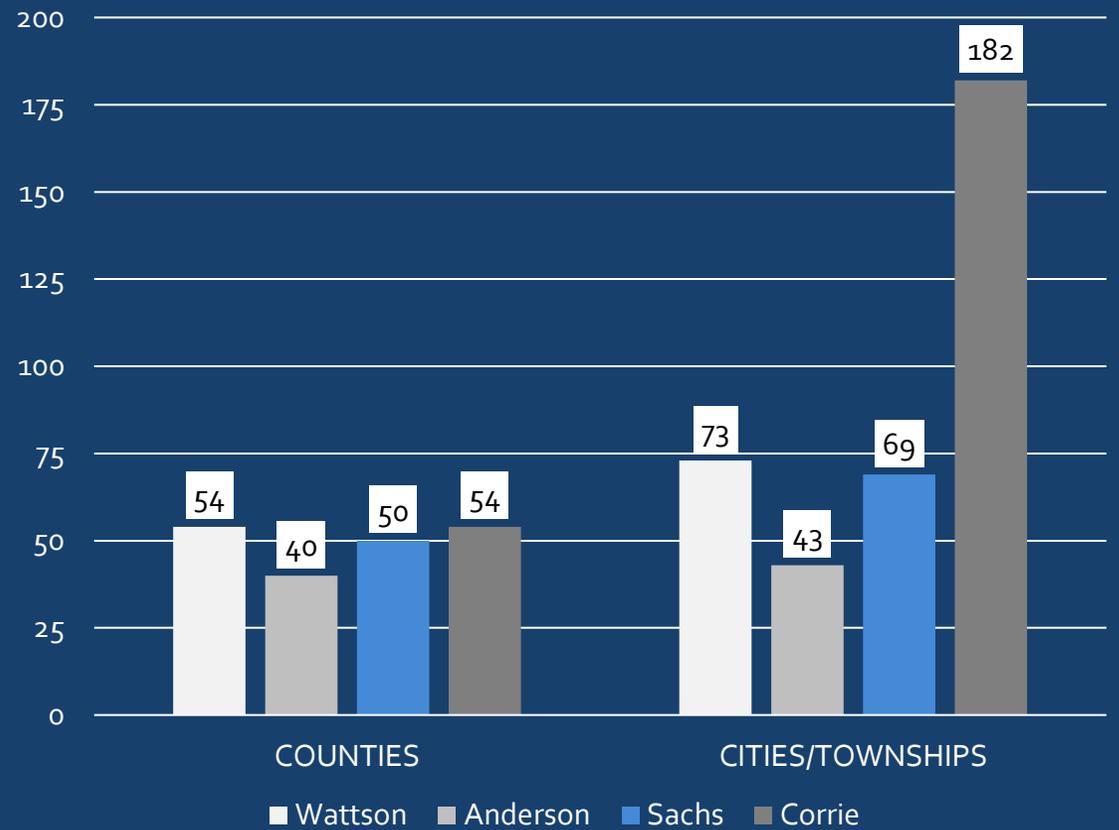
	Wattson (Congressional)	Anderson (Congressional)	Sachs (Congressional)	Corrie (Congressional)
Mean-Median Gap Ideal = 0	6	7	3	4
Lopsided Win Gap Ideal = 0	14	14	14	14
Declination Ideal = 0	17	17	17	17
Efficiency Gap Ideal = 0	10	10	10	10

LEGISLATIVE PLAN

PRESERVING POLITICAL SUBDIVISIONS



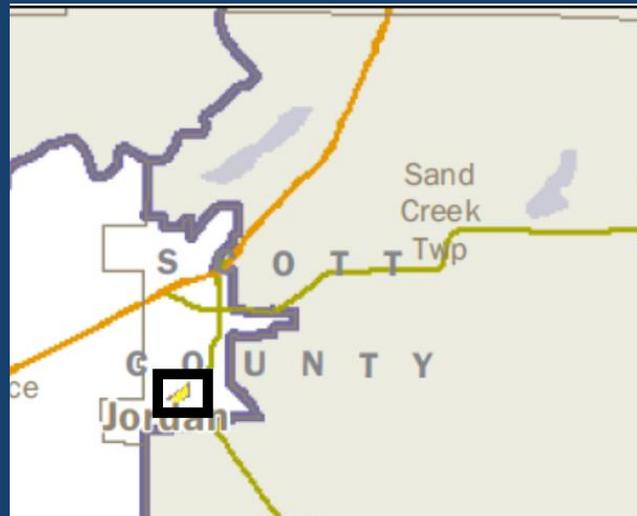
SENATE



HOUSE

PRESERVING POLITICAL SUBDIVISIONS

- Must look beyond the raw numbers.
- Two examples where a township is “split” to preserve contiguity and respect borders of a surrounding city.



One person from Sand Creek Township lives in the middle of the City of Jordan.

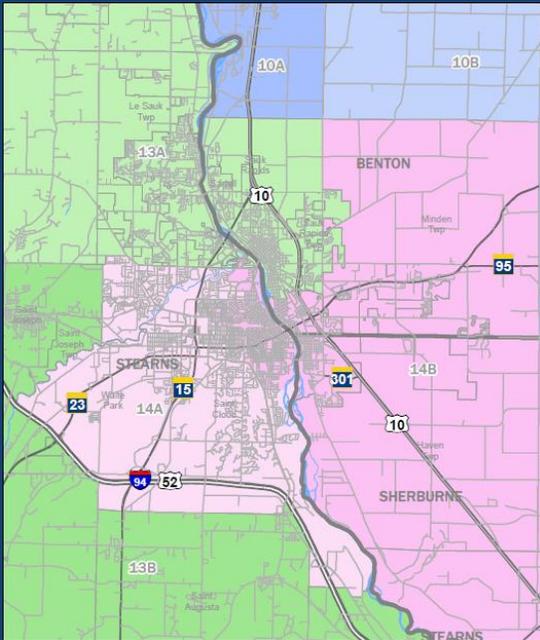


Small piece of Haven Township, with two people, is surrounded by St. Cloud census blocks.

POLITICAL SUBDIVISIONS - ST. CLOUD

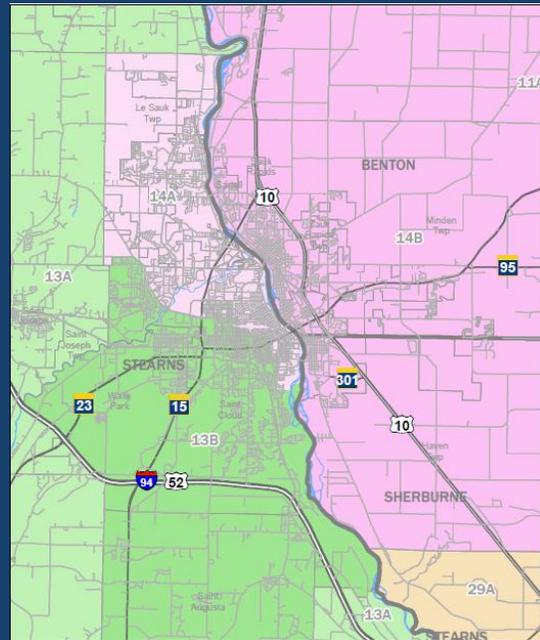
Wattson

Two House, One Senate
Rural townships paired
with City in Senate



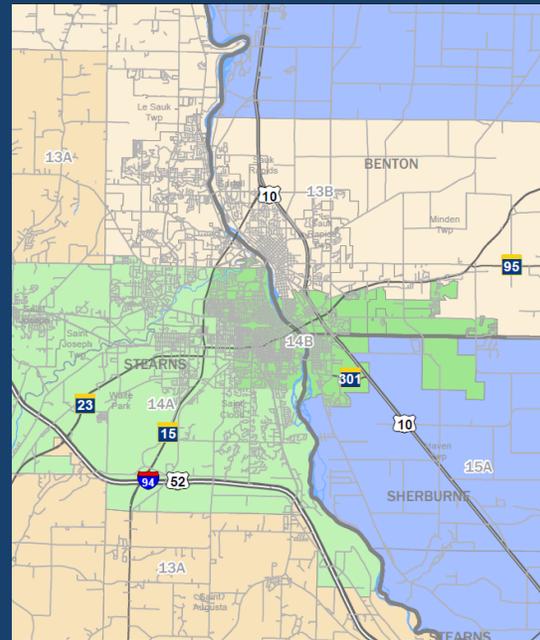
Anderson

Three House, Two Senate
Dilutes minority voting
rights



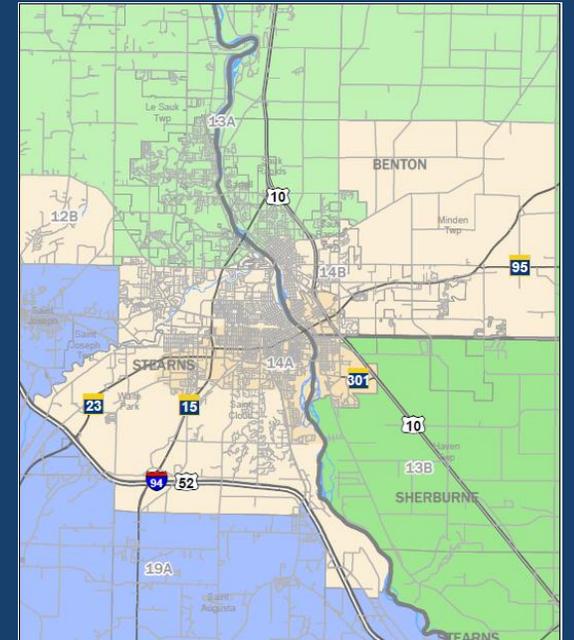
Sachs

Two House, One Senate
Compact, convenient,
minority rights protected



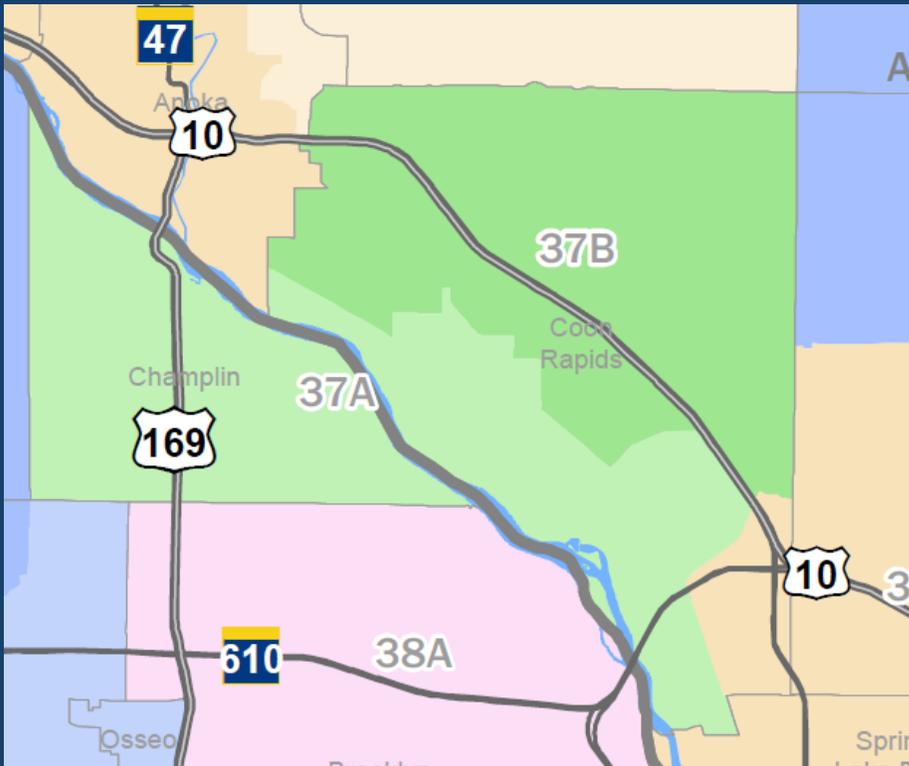
Corrie

Two House, One Senate
14B is neither compact
nor convenient



CONVENIENT AND CONTIGUOUS

Anderson Proposal



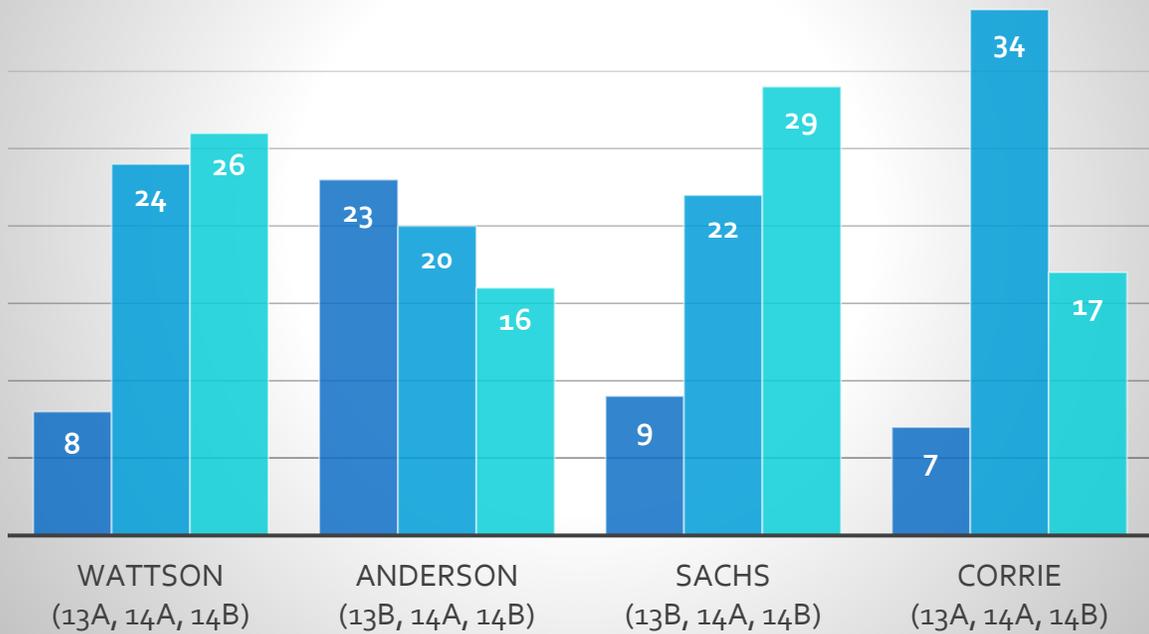
- Contiguity by water is sufficient if the body of water does not pose a serious obstacle to travel *within the district*.
- Voters cannot traverse the Anderson Plaintiffs' proposed House District 37A or Senate District 37 without leaving the district to cross the Mississippi River.
- Easily addressed by every other party.

PROMOTE MINORITY VOTING RIGHTS

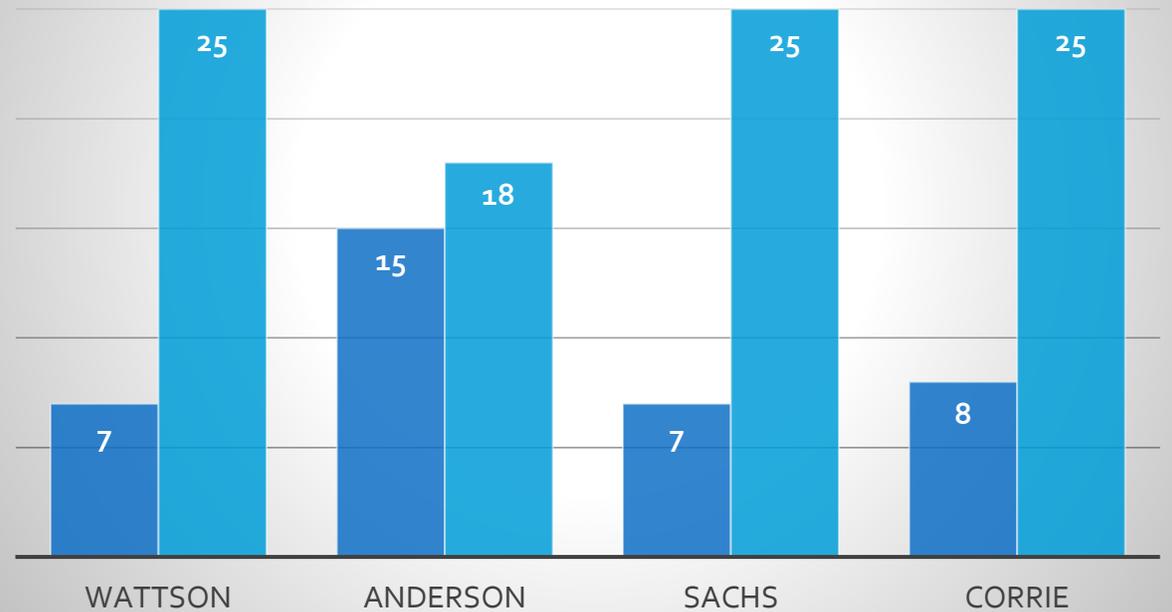
- It is necessary, but not sufficient, to draw maps which do not have the purpose or effect of denying or abridging voting rights on account of race, ethnicity, or membership in a language minority group.
- Rather, districts must be drawn *to protect the equal opportunity* of racial, ethnic, and language minorities to participate in the political process and elect candidates of their choice whether alone or in alliance with others.

ST. CLOUD MINORITY REPRESENTATION

St. Cloud House Districts



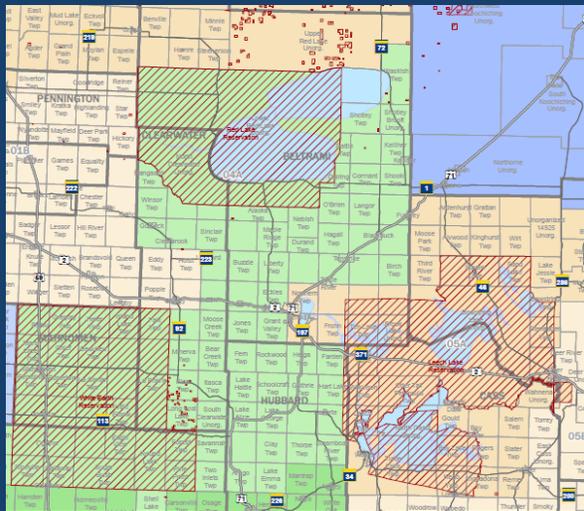
St. Cloud Senate Districts (13 & 14)



ENHANCING THE VOTING POWER OF NATIVE AMERICANS

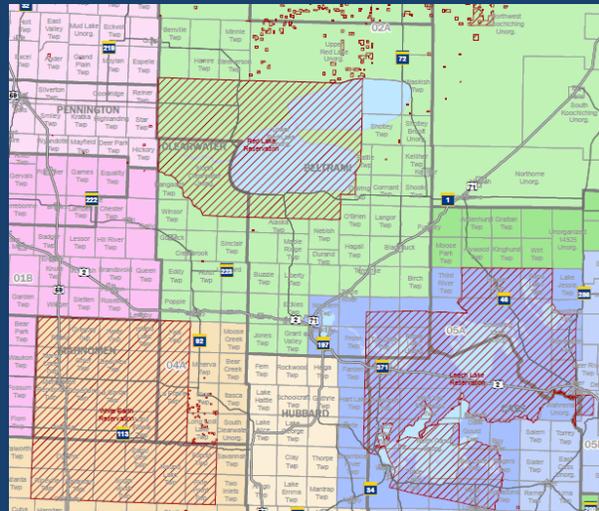
WATTSON

Red Lake and White Earth in one House District. But places Leech Lake in a separate Senate District



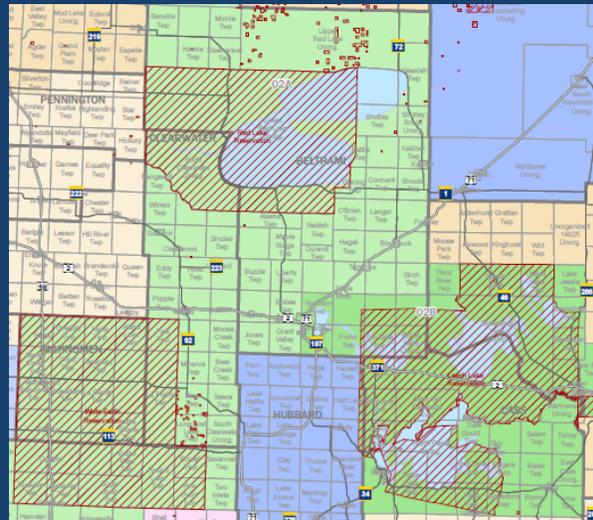
ANDERSON

Leech Lake, Red Lake, and White Earth in separate House and Senate Districts.



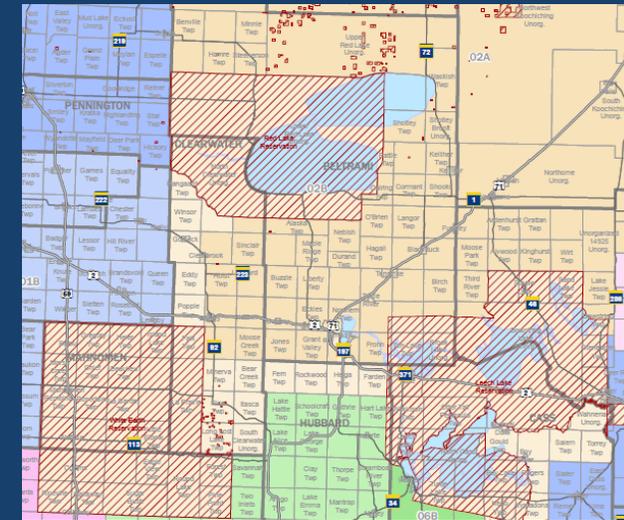
SACHS

Red Lake and White Earth in one House District. Join with Leech Lake in single Senate District.



CORRIE

Leech Lake, Red Lake, and White Earth in single House District. But not convenient.



COMMUNITIES OF INTEREST

- Neither precise nor mathematical. They are defined by how the communities view themselves.
 - Counties, cities, townships, and precincts *are not* communities of interest.
 - Boundaries *are not* defined by roadways or rivers.
- The Panel invited Minnesotans “to comment on how they want their communities to be viewed during redistricting.” That testimony must be incorporated into any redistricting plan.

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PARTISANSHIP

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	Wattson (Senate/House)	Anderson (Senate/House)	Sachs (Senate/House)	Corrie (Senate/House)
Mean-Median Gap Ideal = 0	4 / 3	5 / 6	4 / 3	2 / 3
Lopsided Win Gap Ideal = 0	9 / 10	11 / 12	9 / 8	10 / 10
Declination Ideal = 0	5 / 6	7 / 10	4 / 1	5 / 6
Efficiency Gap Ideal = 0	4 / 5	6 / 7	4 / 3	4 / 5

THERE IS NO “PERFECT” PLAN

- This Panel adopted nine neutral redistricting principles.
- Each principle must be balanced against the others; none may be ignored.
- The Sachs Plaintiffs’ Legislative Plan fully embraces all of the principles, it creates fair and neutral districts, and should be adopted by this panel.